

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA**

**Plaintiff,**

**vs.**

**WILLIAM FERGUSON, et al.**

**Defendants.**

§  
§  
§  
§  
§  
§  
§  
§  
§

**Case No. 19-cr-10081**

**DEFENDANT WILLIAM FERGUSON’S MOTION TO JOIN  
CODEFENDANTS’ MOTIONS TO DISMISS SUPERSEDING INDICTMENT**

Defendant William Ferguson respectfully moves to join—as they pertain to Counts One and Two in the Superseding Indictment—the renewed motions to dismiss and accompanying memoranda filed by Defendants Niki Williams (Docs. 326, 327), Donna Heinel (Docs. 331, 332), Jovan Vavic (Docs. 333, 334), and Jorge Salcedo (Docs. 335, 336.)

Dated: December 20, 2019

Respectfully Submitted,

**SMYSER KAPLAN & VESELKA, L.L.P.**

By: /s/ Alexander M. Wolf  
Alexander M. Wolf (MA State Bar # 685374 and  
Fed. Bar No. 2470631)  
Shaun Clarke (Fed. Bar No. 920661)  
Dane Ball (Fed. Bar No. 784400)  
717 Texas Avenue, Suite 2800  
Houston, Texas 77002  
(713) 221-2300 (phone) | (713) 221-2320 (fax)  
sclarke@skv.com  
dball@skv.com  
awolf@skv.com

**ATTORNEYS FOR DEFENDANT  
WILLIAM FERGUSON**

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

I hereby certify that, pursuant to Rule 7.1(a)(2) of the Local Rules of the United States District Court of Massachusetts, counsel for Defendant Ferguson conferred with counsel for the United States on October 15, 2019 regarding the joinder of motions to dismiss, and Assistant

United States Attorney Eric Rosen informed us that the United States has no objection to Defendant Ferguson joining the other co-defendants' motions to dismiss.

/s/ Alexander M. Wolf

Alexander M. Wolf

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 20, 2019.

/s/ Alexander M. Wolf

Alexander M. Wolf